



UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2018 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

GAGIK AIRAPETIAN,  
PETROS TERAPOYAN,  
STEPAN TERAPOYAN,  
TIGRAN GALSTYAN,  
KAREN POGOSIAN,  
NIKOGHOS PETROSYAN,  
DAVIT ASOYAN, and  
HAROUTIOUN DEMIRDJIAN,

Defendants.

CR No. 18-18CR00548-DMG

I N D I C T M E N T

[18 U.S.C. § 371: Conspiracy to Commit Bank Fraud, Money Laundering, Identity Theft, and Aggravated Identity Theft; 18 U.S.C. § 1344(2): Bank Fraud and Attempted Bank Fraud; 18 U.S.C. § 1956(a)(3)(B): Laundering of Monetary Instruments; 18 U.S.C. § 1349: Conspiracy to Commit Health Care Fraud; 18 U.S.C. § 1028(a)(7): Unlawful Transfer, Possession, and Use of Means of Identification; 18 U.S.C. § 1028A(a)(1): Aggravated Identity Theft; 18 U.S.C. § 2(a): Aiding and Abetting; 18 U.S.C. § 2(b): Causing an Act to be Done]

The Grand Jury charges:

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COUNT ONE

[18 U.S.C. § 371]

A. OBJECTS OF THE CONSPIRACY

Beginning on a date unknown to the Grand Jury, but no later than on or about January 9, 2012, and continuing to on or about December 2, 2014, in Los Angeles and San Luis Obispo Counties, within the Central District of California, and elsewhere, defendants GAGIK AIRAPETIAN ("AIRAPETIAN"), PETROS TERAPOYAN ("P. TERAPOYAN"), STEPAN TERAPOYAN ("S. TERAPOYAN"), TIGRAN GALSTYAN ("GALSTYAN"), KAREN POGOSIAN ("POGOSIAN"), NIKOGHOS PETROSYAN ("PETROSYAN"), DAVIT ASOYAN ("ASOYAN"), and HAROUTIOUN DEMIRDJIAN ("DEMIRDJIAN"), together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit offenses against the United States, namely:

1. Bank Fraud, in violation of Title 18, United States Code, Section 1344;
2. Money Laundering, in violation of Title 18, United States Code, Section 1956(a)(1)(B)(i);
3. Unlawful Possession and Use of Means of Identification, in violation of Title 18, United States Code, Section 1028(a)(7); and
4. Aggravated Identity Theft, in violation of Title 18, United States Code, Section 1028A(a)(1).

B. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE ACCOMPLISHED

The objects of the conspiracy were to be accomplished, in substance, as follows:

1. Defendant AIRAPETIAN and others known and unknown to the

1 Grand Jury would obtain personal identifying information ("PII") of  
2 third parties (hereinafter, "the victims"), including the victims'  
3 foreign passports, names, dates of birth, and foreign passport  
4 details, which generally were from the Republic of Armenia.

5 2. Defendant AIRAPETIAN would share that PII with defendants  
6 P. TERAPOYAN, S. TERAPOYAN, GALSTYAN, POGOSIAN, PETROSYAN, ASOYAN,  
7 and DEMIRDJIAN.

8 3. Defendant AIRAPETIAN would charge a 30% laundering fee to  
9 exchange checks represented to be proceeds of specified unlawful  
10 activity into cash.

11 4. Defendant AIRAPETIAN and others known and unknown to the  
12 Grand Jury would cause fraudulent foreign passports and other  
13 identification to be fabricated using the photographs of defendants  
14 POGOSIAN and PETROSYAN and others known and unknown to the Grand  
15 Jury, by laminating their photographs on top of the photographs on  
16 the legitimate passports.

17 5. Defendant AIRAPETIAN would direct others to open mailbox  
18 and bank accounts in other individuals' identities by using  
19 fraudulent identification, including altered Republic of Armenia  
20 passports.

21 6. In exchange for a \$30,000 fee, defendants AIRAPETIAN and  
22 POGOSIAN would also agree to open a bank account that they believed  
23 would be used to receive proceeds of health care fraud.

24 7. Defendant GALSTYAN would recruit individuals to open  
25 mailbox and bank accounts using fraudulent identification and would  
26 drive others to do so or to pick up checks that had been issued to  
27 fraudulent identities.

28 8. Defendants POGOSIAN and PETROSYAN, and others known and

1 unknown to the Grand Jury, would rent mailbox accounts at Commercial  
2 Mail Receiving Agencies ("CMRA") throughout southern California.

3 9. To open those mailbox accounts at the CMRAs, defendants  
4 POGOSIAN and PETROSYAN and others known and unknown to the Grand Jury  
5 would unlawfully pose in the identities of real persons, including  
6 A.Ag., Y.G., V.S., E.A., H.B., A.As., A.K., and E.S., by presenting  
7 fraudulent identification in the names of those other persons,  
8 including Republic of Armenia passports that had been altered to  
9 contain defendants POGOSIAN's and PETROSYAN's respective photographs.

10 10. While posing in other identities and using fraudulent  
11 identification, including altered Republic of Armenia passports names  
12 of those other persons, but with defendant POGOSIAN's and PETROSYAN's  
13 respective photographs, defendants POGOSIAN and PETROSYAN, and others  
14 known and unknown to the Grand Jury, would open bank accounts in  
15 those fraudulent identities at multiple different banks, at bank  
16 branches located in the Central District of California ("Scheme Bank  
17 Accounts"), through which checks represented to be proceeds of  
18 specified unlawful activity would be deposited, to conceal the  
19 nature, the location, the source, the ownership, and the control of  
20 the specified unlawful activity.

21 11. Defendants P. TERAPOYAN and S. TERAPOYAN would provide  
22 cell phones that would be used to conduct business on the fraudulent  
23 mailbox and bank accounts.

24 12. Defendants AIRAPETIAN, P. TERAPOYAN, and S. TERAPOYAN  
25 would receive bank checks represented to be proceeds of specified  
26 unlawful activity, to be deposited to Scheme Bank Accounts.

27 13. Defendants ASOYAN and DEMIRDJIAN would deposit checks into  
28 Scheme Bank Accounts.

1 14. After deducting a 30% laundering fee, defendants  
2 AIRAPETIAN, P. TERAPOPYAN, and S. TERAPOPYAN, and others known and  
3 unknown to the Grand Jury, would provide cash, often secreted inside  
4 a cell phone box, to a person working at the direction of, and with  
5 the approval of, federal law enforcement.

6 15. The Scheme Bank Accounts would be used to launder proceeds  
7 from specified unlawful activity and proceeds represented to be from  
8 specified unlawful activity.

9 C. OVERT ACTS

10 In furtherance of the conspiracy, and to accomplish its objects,  
11 on or about the following dates, defendants AIRAPETIAN, P.  
12 TERAPOPYAN, S. TERAPOPYAN, GALSTYAN, POGOSIAN, PETROSYAN, ASOYAN, and  
13 DEMIRDJIAN, and others known and unknown to the Grand Jury, committed  
14 various overt acts within the Central District of California, and  
15 elsewhere, including, but not limited to, the following:

16 Overt Act No. 1: On or about November 10, 2011, defendant  
17 AIRAPETIAN explained how the laundering process would work and  
18 bragged about running the laundering operation, stating: "I'm far  
19 away. I peacefully observe from above."

20 Overt Act No. 2: On or about February 8, 2012, defendant  
21 PETROSYAN opened bank account no. XXXXXX8298 in the name of A.Ag. at  
22 a Bank of America branch in Pismo Beach, California, by using an  
23 altered Republic of Armenia passport in the name of A.Ag.

24 Overt Act No. 3: On or about September 20, 2012, defendant  
25 DEMIRDJIAN deposited check no. 1085 in the amount of \$9,950 to bank  
26 account no. XXXXXX8298 in the name of A.Ag.

27 Overt Act No. 4: On or about October 15, 2012, defendant P.  
28 TERAPOPYAN provided \$25,900 cash to an individual who defendant P.

1 TERAPOYAN believed to be a health care fraud operator, intending to  
2 conceal the nature, the location, the source, the ownership, and the  
3 control of the funds represented to be proceeds of health care fraud.

4 Overt Act No. 5: On or about October 29, 2012, defendant ASOYAN  
5 deposited check no. 1088 in the amount of \$27,905 to bank account no.  
6 XXXXXX8298 in the name of A.Ag.

7 Overt Act No. 6: On or about November 15, 2012, defendant P.  
8 TERAPOYAN provided \$19,600 cash to an individual who defendant P.  
9 TERAPOYAN believed to be a health care fraud operator, intending to  
10 conceal the nature, the location, the source, the ownership, and the  
11 control of the funds represented to be proceeds of health care fraud.

12 Overt Act No. 7: On or December 11, 2012, an unknown co-  
13 conspirator sent an email message to the San Luis Obispo UPS Store  
14 with documents to re-open the A.Ag. mailbox account.

15 Overt Act No. 8: On or about January 19, 2013, defendant  
16 GALSTYAN drove an unindicted co-conspirator from the Los Angeles area  
17 to a mailbox location in San Luis Obispo, in order to pick up a check  
18 that had been issued to fraudulent identity A.Ag.

19 Overt Act No. 9: On or about February 14, 2013, defendant  
20 AIRAPETIAN provided \$24,150 cash to an individual who defendant  
21 AIRAPETIAN believed to be a health care fraud operator, intending to  
22 conceal the nature, the location, the source, the ownership, and the  
23 control of the funds represented to be proceeds of health care fraud.

24 Overt Act No. 10: On or about April 26, 2013, defendant  
25 AIRAPETIAN provided \$18,900 cash to an individual who defendant  
26 AIRAPETIAN believed to be a health care fraud operator, intending to  
27 conceal the nature, the location, the source, the ownership, and the  
28 control of the funds represented to be proceeds of health care fraud.

1       Overt Act No. 11: On or about May 29, 2013, defendant S.  
2       TERAKOPYAN provided \$28,000 cash to an individual who defendant S.  
3       TERAKOPYAN believed to be a health care fraud operator, intending to  
4       conceal the nature, the location, the source, the ownership, and the  
5       control of the funds represented to be proceeds of health care fraud.

6       Overt Act No. 12: On or about July 11, 2013, defendant S.  
7       TERAKOPYAN provided \$42,000 cash to an individual who defendant S.  
8       TERAKOPYAN believed to be a health care fraud operator, intending to  
9       conceal the nature, the location, the source, the ownership, and the  
10      control of the funds represented to be proceeds of health care fraud.

11      Overt Act No. 13: On or about July 31, 2013, defendant  
12      AIRAPETIAN instructed defendant POGOSIAN to go open another  
13      fraudulent bank account, stating "who cares about the ID. Go to Bank  
14      of America and open a personal account - later can add DBA."

15      Overt Act No. 14: On or about July 31, 2013, defendant POGOSIAN  
16      provided a "Medicare Enrollment Application" where he had  
17      fraudulently signed in the name of H.S.

18      Overt Act No. 15: On or about August 5, 2013, defendant  
19      POGOSIAN possessed an International Driver's License and Republic of  
20      Armenia passport in the name of H.S.

21      Overt Act No. 16: On or about August 15, 2013, defendant  
22      AIRAPETIAN had a conversation with an individual he believed to be a  
23      health care fraud operator, where defendant AIRAPETIAN said that  
24      defendant AIRAPETIAN had left cash yesterday with a nominee that was  
25      now at the nominee's house, so defendant AIRAPETIAN had sent someone  
26      to pick up that cash and bring it to the business operated by  
27      defendants P. TERAKOPYAN and S. TERAKOPYAN.

28      Overt Act No. 17: On or about August 15, 2013, defendant P.



1 TERAPOPYAN drove from defendant POGOSIAN's residence in Sun Valley to  
2 defendants P. TERAPOPYAN and S. TERAPOPYAN's business, and  
3 thereafter, defendant P. TERAPOPYAN retrieved a bag with \$14,700 in  
4 cash and handed it to an individual they believed to be a health care  
5 fraud operator.

6 Overt Act No. 18: On or about August 28, 2013, defendant  
7 AIRAPETIAN called an individual he believed to be a health care fraud  
8 operator and stated that a bank account would be opened the next day.

9 Overt Act No. 19: On or about August 29, 2013, defendant  
10 POGOSIAN posed in the identity of H.S. to open a business bank  
11 account in H.S.'s name at Bank of America.

12 Overt Act No. 20: On or about August 29, 2013, defendant  
13 POGOSIAN signed temporary checks drawn on the bank account that  
14 defendant POGOSIAN had just opened in the name of H.S.

15 Overt Act No. 21: On or about August 29, 2013, defendant  
16 POGOSIAN posed in the identity of H.S., including using altered  
17 Republic of Armenia passport number XXXXX2070 in the name of H.S., to  
18 open bank account number XXXXXXXX4264 at Bank of America in the name  
19 of H.S. doing business as "Lion Medical Supply."

20 Overt Act No. 22: On or about August 29, 2013, defendant S.  
21 TERAPOPYAN called defendant P. TERAPOPYAN by telephone and asked  
22 defendant P. TERAPOPYAN "Dad. Did Gago give a phone yesterday night?"  
23 and then gave a cellphone box with \$37,100 cash inside of it to an  
24 individual they believed to be a health care fraud operator.

25 Overt Act No. 23: On or about October 23, 2013, defendant  
26 POGOSIAN signed checks drawn on the H.S. bank account that defendant  
27 POGOSIAN had fraudulently opened on August 29, 2013.

28 Overt Act No. 24: On or about December 2, 2014, defendant S.



1 TERAPOPYAN accepted \$3,000 cash intended to pay defendant POGOSIAN  
2 for opening the fraudulent H.S. bank account.

COUNTS TWO THROUGH TEN

[18 U.S.C. §§ 1344(2), 2(a), 2(b)]

A. INTRODUCTORY ALLEGATION

1. At all times relevant to this Indictment:

a. Bank of America, N.A. ("Bank of America") was a federally insured financial institution with branches throughout the United States.

b. Citibank was a federally insured financial institution with branches throughout the United States.

c. JPMorgan Chase Bank, N.A. ("Chase") was a federally insured financial institution with branches throughout the United States.

d. Wells Fargo Bank, N.A. ("Wells Fargo") was a federally insured financial institution with branches throughout the United States.

B. SCHEME TO DEFRAUD

2. Beginning on a date unknown but no later than in or about January 2012, and continuing until in or about October 2013, in Los Angeles and San Luis Obispo Counties, within the Central District of California, and elsewhere, defendants GAGIK AIRAPETIAN ("AIRAPETIAN"), PETROS TERAPOYAN ("P. TERAPOYAN"), STEPAN TERAPOYAN ("S. TERAPOYAN"), TIGRAN GALSTYAN ("GALSTYAN"), KAREN POGOSIAN ("POGOSIAN"), NIKOGHOS PETROSYAN ("PETROSYAN"), DAVIT ASOYAN ("ASOYAN"), and HAROUTIOUN DEMIRDJIAN ("DEMIRDJIAN"), together with others known and unknown to the Grand Jury, each aiding and abetting the others, knowingly and with intent to defraud, executed and attempted to execute a scheme to obtain moneys, funds, assets, and other property owned by and in the custody and control of Bank of

1 America, Citibank, Chase, and Wells Fargo (collectively, "the Banks")  
2 by means of material false and fraudulent pretenses, representations,  
3 and promises, and the concealment of material facts.

4 3. The fraudulent scheme operated, in substance, in the  
5 following manner:

6 a. The Grand Jury re-alleges Section B of Count One of  
7 this Indictment as though set forth in their entirety here.

8 b. When defendants POGOSIAN and PETROSYAN opened the bank  
9 accounts at the Banks, the Banks would provide temporary checks.

10 c. The Banks would also mail checkbooks for those bank  
11 accounts to the addresses that defendants POGOSIAN and PETROSYAN had  
12 provided to the banks.

13 d. Defendants POGOSIAN and PETROSYAN would sign and issue  
14 checks drawn on those accounts using the names of the fraudulent  
15 identities.

16 e. Defendant AIRAPETIAN and others known and unknown to  
17 the Grand Jury would receive blank, signed checks from an account  
18 represented to have received proceeds of health care fraud, in the  
19 name of company "Best of LA Medical Supply" ("BLAMS checks").

20 f. Defendants ASOYAN and DEMIRDJIAN would deposit BLAMS  
21 checks made payable to names from accounts that defendants POGOSIAN  
22 and PETROSYAN, and other schemers known and unknown to the Grand  
23 Jury, had fraudulently opened while posing in other identities.

24 C. EXECUTION OF THE SCHEME TO DEFRAUD

25 4. On or about the dates set forth below, in Los Angeles  
26 County, within the Central District of California, and elsewhere,  
27 defendants AIRAPETIAN, P. TERAPOYAN, S. TERAPOYAN, GALSTYAN,  
28 POGOSIAN, PETROSYAN, ASOYAN, and DEMIRDJIAN, together with others

known and unknown to the Grand Jury, each aiding and abetting the others, executed and attempted to execute the fraudulent scheme, by committing, aiding and abetting the commission, and willfully causing others to commit the following acts:

COUNT	DATE	ACT
TWO	02/08/2012	Opening bank account XXXXXX3471 at Bank of America branch in San Luis Obispo, California, in the name of A.As.
THREE	02/08/2012	Opening bank account XXXXXX8298 at Bank of America branch in Pismo Beach, California, in the name of A.Ag. ("BOA account 8298")
FOUR	09/20/2012	Depositing BLAMS check no. 1085 for \$9,950 into BOA account 8298
FIVE	10/29/2012	Depositing BLAMS check no. 1088 for \$27,905 into BOA account 8298
SIX	02/19/2013	Issuing check no. 1018 from Bank of America account XXXXXXXX2177 for \$10,105, made payable to an account that had been opened by defendant PETROSYAN's wife A.M.
SEVEN	02/19/2013	Issuing check no. 128 from Chase account XXXXX7095 for \$6,050, made payable to an account that had been opened by defendant PETROSYAN's wife A.M.
EIGHT	08/05/2013	Attempting to open a bank account at Bank of America branch in North Hollywood, California, in the name of H.S. dba "Lion Medical Supply"
NINE	08/19/2013	Depositing BLAMS check no. 1129 for \$18,390 into Bank of America account XXXXXXXX3205
TEN	08/29/2013	Opening bank account XXXXXXXX4264 at Bank of America branch in North Hollywood, California, in the name of H.S. dba "Lion Medical Supply"

## COUNT ELEVEN

[18 U.S.C. § 1956(a)(3)(B)]

Beginning on or about August 15, 2013, and continuing to on or about August 29, 2013, in Los Angeles County, within the Central District of California, and elsewhere, defendants GAGIK AIRAPETIAN ("AIRAPETIAN"), PETROS TERAPOYAN ("P. TERAPOYAN"), STEPAN TERAPOYAN ("S. TERAPOYAN"), and KAREN POGOSIAN ("POGOSIAN"), each aiding and abetting the other, with the intent to conceal and disguise the nature, location, source, ownership, and control of property believed to be the proceeds of specified unlawful activity, that is, health care fraud, conducted a financial transaction, affecting interstate and foreign commerce, involving property represented to be the proceeds of specified unlawful activity by a person at the direction of, and with the approval of, a Federal official authorized to investigate and prosecute violations of money laundering, that is, health care fraud. Specifically, defendants AIRAPETIAN, P. TERAPOYAN, S. TERAPOYAN, and POGOSIAN, after having charged a 30 percent fee from the \$53,000 written on checks represented to be the proceeds of health care fraud, arranged for the delivery of \$37,100 cash.

COUNT TWELVE

[18 U.S.C. § 1349]

A. OBJECT OF THE CONSPIRACY

Beginning on or about February 14, 2013, and continuing through on or about December 2, 2014, in Los Angeles County, within the Central District of California, and elsewhere, defendants GAGIK AIRAPETIAN ("AIRAPETIAN") and KAREN POGOSIAN ("POGOSIAN"), together with others known and unknown to the Grand Jury, conspired and agreed with each other to knowingly and intentionally commit Health Care Fraud, in violation of Title 18, United States Code, Section 1347.

B. MEANS BY WHICH THE OBJECT OF THE CONSPIRACY WAS TO BE ACCOMPLISHED

The object of the conspiracy was to be accomplished in substance as follows:

1. In exchange for a \$30,000 fee, defendants AIRAPETIAN and POGOSIAN would agree to open a bank account that they believed would be used to receive proceeds of health care fraud.

2. Defendant POGOSIAN would use fraudulent identification in the name of another identity to open that bank account.

3. Defendant POGOSIAN would sign bank opening documents and checks using the name of that other identity.

4. Defendant POGOSIAN would sign a "Medicare Enrollment Application" using the name of that other identity.

C. OVERT ACTS

In furtherance of the conspiracy, and to accomplish its object, on or about the following dates, defendants AIRAPETIAN and POGOSIAN, and others known and unknown to the Grand Jury, committed various overt acts within the Central District of California, and elsewhere,

1 including, but not limited to, the following:

2 Overt Act No. 1: On or about June 6, 2013, defendants  
3 AIRAPETIAN and POGOSIAN met to discuss opening a bank account in  
4 fraudulent identity H.S., which bank account would be used to receive  
5 proceeds represented to be from health care fraud.

6 Overt Act No. 2: On or about July 31, 2013, defendants  
7 AIRAPETIAN and POGOSIAN met to discuss their plan for defendant  
8 POGOSIAN to open the bank account in the name of H.S.

9 Overt Act No. 3: On or about July 31, 2013, defendant POGOSIAN  
10 provided a "Medicare Enrollment Application" form that POGOSIAN had  
11 signed in the name of H.S. under that form's section entitled  
12 "Authorized Official Signature."

13 Overt Act No. 4: On or about August 5, 2013, defendant POGOSIAN  
14 posed in the identity of H.S., including using altered Republic of  
15 Armenia passport number XXXXX2070 in the name of H.S., to attempt to  
16 open a bank account at Bank of America in the name of H.S. doing  
17 business as "Lion Medical Supply," but he was unsuccessful because  
18 the bank would not accept a P.O. Box for the business address.

19 Overt Act No. 5: On or about August 29, 2013, defendant  
20 POGOSIAN posed in the identity of H.S., including using altered  
21 Republic of Armenia passport number XXXXX2070 in the name of H.S., to  
22 open bank account number XXXXXXXX4264 at Bank of America in the name  
23 of H.S. doing business as "Lion Medical Supply."

24 Overt Act No. 6: On or about August 29, 2013, defendant  
25 POGOSIAN signed 10 temporary checks from the Lion Medical Supply bank  
26 account in the name of the fraudulent H.S. identity.

27 Overt Act No. 7: On or about October 23, 2013, defendant  
28 POGOSIAN signed multiple checks drawn on the Lion Medical Supply bank



1 account using the name of the fraudulent H.S. identity.

2       Overt Act No. 8: On or about April 2, 2014, defendant  
3 AIRAPETIAN called an individual he believed to be a health care fraud  
4 operator to relate that defendant POGOSIAN had called defendant  
5 AIRAPETIAN to find out what was happening with the Lion Medical  
6 Supply bank account that defendant POGOSIAN had opened.

7       Overt Act No. 9: On or about December 2, 2014, Stepan  
8 TerAkopyan accepted \$3,000 cash intended for defendant POGOSIAN.

## COUNTS THIRTEEN THROUGH FIFTEEN

[18 U.S.C. §§ 1028(a)(7), 2(a)]

On or about the following dates, in Los Angeles County, within the Central District of California, and elsewhere, defendants GAGIK AIRAPETIAN ("AIRAPETIAN") and KAREN POGOSIAN ("POGOSIAN"), each aiding and abetting the other, knowingly transferred, possessed, and used, without lawful authority, means of identification of another person, namely, the names, passport numbers, and signatures of H.S., in the locations listed below, with the intent to commit, to aid and abet the commission of, and in connection with the commission of, a violation of Federal law, namely, Conspiracy to Commit Bank Fraud and Money Laundering, in violation of Title 18, United States Code, Section 371, Bank Fraud and Attempted Bank Fraud, in violation of Title 18, United States Code, Section 1344(2), and Conspiracy to Commit Health Care Fraud, in violation of Title 18, United States Code, Section 1349, with said transfer, possession, and use affecting interstate and foreign commerce:

COUNT	DATE	LOCATION
THIRTEEN	08/29/2013	Bank of America branch North Hollywood, California
FOURTEEN	08/29/2013	Parking lot North Hollywood, CA
FIFTEEN	10/23/2013	POGOSIAN's residence Sun Valley, CA

## COUNTS SIXTEEN THROUGH EIGHTEEN

[18 U.S.C. §§ 1028A(a)(1), 2(a)]

On or about the dates below, in Los Angeles County, within the Central District of California, defendants GAGIK AIRAPETIAN ("AIRAPETIAN") and KAREN POGOSIAN ("POGOSIAN"), each aiding and abetting the other, knowingly transferred, possessed, and used, without lawful authority, means of identification that defendants AIRAPETIAN and POGOSIAN knew belonged to another person, namely, the names, passport numbers, and signatures of H.S., in the locations listed below, during and in relation to the offenses of Conspiracy to Commit Bank Fraud and Money Laundering, a felony violation of Title 18, United States Code, Section 371, Bank Fraud and Attempted Bank Fraud, a felony violation of Title 18, United States Code, Section 1344(2), and Conspiracy to Commit Health Care Fraud, a felony violation of Title 18, United States Code, Section 1349, as charged in the following counts of this Indictment:

COUNT	DATE	LOCATION	PREDICATE OFFENSES COUNTS
SIXTEEN	08/29/2013	Parking lot North Hollywood, CA	ONE
SEVENTEEN	08/29/2013	Bank of America branch North Hollywood, CA	TEN
EIGHTEEN	10/23/2013	POGOSIAN's residence Sun Valley, CA	TWELVE

COUNTS NINETEEN THROUGH TWENTY-ONE

[18 U.S.C. § 1028A(a)(1)]

On or about the dates below, in San Luis Obispo County, within the Central District of California, defendant NIKOGHOS PETROSYAN ("PETROSYAN") knowingly transferred, possessed, and used, without lawful authority, means of identification that defendant PETROSYAN knew belonged to another person, namely, the names, passport numbers, and signatures of the persons listed below, during and in relation to the offenses of Conspiracy to Commit Bank Fraud and Money Laundering, a felony violation of Title 18, United States Code, Section 371, and Bank Fraud and Attempted Bank Fraud, a felony violation of Title 18,

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United States Code, Section 1344(2), as charged in the following counts of this Indictment.

COUNT	DATE	IDENTITY	LOCATION	PREDICATE OFFENSES COUNTS
NINETEEN	02/08/2012	A.Ag.	UPS Store No. 2479 San Luis Obispo, CA	ONE
TWENTY	02/08/2012	A.As.	UPS Store No. 4581 San Luis Obispo, CA	TWO
TWENTY- ONE	02/08/2012	A.Ag.	Bank of America branch Pismo Beach, CA	THREE

A TRUE BILL

15/  
Foreperson

TRACY L. WILKISON  
Attorney for the United States,  
Acting Under Authority Conferred  
by 28 U.S.C. § 515

  
LAWRENCE S. MIDDLETON  
Assistant United States Attorney  
Chief, Criminal Division

DENNISE D. WILLETT  
Assistant United States Attorney  
Chief, Santa Ana Branch Office

CHARLES E. PELL  
Assistant United States Attorney  
Santa Ana Branch Office